

March 23, 1999

WELFARE-TO-WORK PLAN FOR INDIANA

VISION STATEMENT

The Welfare-to-Work (WtW) resources will lead to increased self-sufficiency of long-term welfare recipients through work and personal responsibility. These resources will complement Indiana's commitment to a philosophy of lifelong learning by building on the services already available for eligible welfare parents and noncustodial parents of welfare children. Our priorities include:

- Keeping recipients of Temporary Assistance for Needy Families employed for eighteen (18) months, increasing their skills, achieving long-term self-sufficiency and increased earnings.
- Helping noncustodial parents provide resources to their children and increase their own skills and earnings.
- Helping individuals who have exhausted their benefits to achieve self-sufficiency.
- Exploring the value of individual development accounts in asset creation.

I. Welfare-to-Work Program Description.

The State of Indiana will submit to the Secretary of Labor and the Secretary of Health and Human Services a Welfare-to-Work Formula Grant plan that addresses all requirements under the statutory provisions of the Balanced Budget Act of 1997, Section 5001, as an addendum to the State Temporary Assistance for Needy Families (TANF) Plan. This is not considered a separate program in and of itself, but as an additional resource to help the "hard to serve" TANF recipients and noncustodial parents become self-sufficient.

A. Program Design. The following is a description of how Indiana will implement and oversee the Welfare-to-Work resources during Fiscal Year 1998:

1. State and Local Targeting Strategies.

The strategy for Welfare-to-Work activities and support is to address the multiple barriers facing hard-to-serve TANF recipients and noncustodial parents in finding and keeping employment. Emphasis is placed on understanding what barriers exist, creating individual solutions, providing needed assistance, and strengthening relationships with other agencies to collaboratively provide long term resolutions for these problems. Indiana will emphasize and reward innovative solutions rather than the standard methods used by traditional welfare-to-work programs to address the problems of long-term dependency.

State level consultations and planning meetings to plan Welfare-to Work strategies have been held with Local Elected Officials (LEO), Township Trustees, Local Planning Councils, Private Industry Council (PIC) Chairs, PIC members, PIC staff, members of the Indiana Association of Rehabilitation Facilities, Community Development Corporations, the Indiana Housing Finance Authority, the Indiana Department of Transportation, the Indiana Department of Commerce, and both Department of Workforce Development (DWD) and the Division of Family and Children (DFC) of the Family and Social Service Administration (FSSA) staff.

NOTE: Indiana will implement the Workforce Investment Act (WIA) on July 2, 1999. As a result, Workforce Investment Boards (WIBs) will replace PICs; and workforce investment areas will replace service delivery areas (SDAs) throughout the State. The boundaries of the workforce investment areas are identical to the SDAs. This transition will take place after Indiana has operated a WtW program with PICs as local grant recipients during program year 1998. For the purposes of this plan, we will use the term WIBs rather than PICs when referring to the governing and operating entities for the WtW program in Indiana after July 2, 1999. PICs will be mentioned in the context of planning activity that takes place prior to July 2, 1999.

DWD and DFC will take the following steps to ensure local WIB and DFC offices can appropriately identify and target the hard-to-employ TANF recipients and to ensure that appropriate activities and services are provided to help these individuals achieve self-sufficiency:

- Disseminate information showing the welfare population of each county and a break-out of the various groups of hard-to-serve clients to local planning groups. For example, this information will show the numbers of individuals currently working but still on welfare; the numbers who are currently exempt due to disabilities, or age; the numbers who are in child only cases and thus exempt from TANF time limits; the numbers who function at or below the 8.9 grade level in reading and/or math; the estimated number with substance abuse problems, domestic violence problems, or mental problems; the numbers of cases with teen parents; the number of noncustodial parents associated with TANF cases; and the number of cases already in transition off welfare and the unemployment rates for each county. Target cases will be determined on a case by case basis by the TANF case coordinator.
- Engage local planning councils in assisting WIBs to identify strategies and plans for identifying and determining the best practices to use in meeting the needs of the hard-to-serve population in each workforce investment area.
- Identify and certify the eligibility of long-term welfare recipients, share any prior assessment information, and provide copies of the DFC self-sufficiency plan and other information needed by the service provider to serve the individual.

- Develop an agreement with each service provider relative to how they intend to use WtW resources to implement, administer, track, and report needed services to the target populations.
- Encourage WIB and local DFC staff to hold meetings with other community organizations in each county to explain plans for Indiana and solicit comments on local plans.

The specific strategies identifying and reaching the targeted populations include, but are not limited to:

- Referral from the local DFC office at certain trigger points, such as when substance abuse or other serious barriers are identified; when a TANF client goes to work but is not earning enough to leave welfare; is within twelve (12) months of losing benefits; or when TANF has been unsuccessful in achieving full participation from a client and cannot identify the barriers that are impeding participation (the family is threatened with sanctions if the parent does not comply); and
- Referrals from the local child support office of noncustodial parents who either are not paying child support or who are not able to pay enough support to take children off welfare when the custodial parent meets WtW eligibility. This strategy also involves working with the courts to ask for alternative assignment to a WtW provider in lieu of jail when a noncustodial parent cannot pay required child support payments; or
- The client is no longer eligible for TANF.
- Outreach through:
 - subsidized housing agencies;
 - township trustees;
 - community based development organizations;
 - faith-based organizations;
 - school corporations;
 - community social workers;
 - local food pantries and soup kitchens;
 - subsidized child care providers and Step Ahead;
 - prosecutors' offices and the court system;
 - substance abuse treatment providers;
 - ABE/GED service providers;
 - volunteer literacy providers;
 - United Way agencies which target TANF recipients;
 - providers of services to the homeless;
 - Vocational Rehabilitation;
 - health clinics;
 - Community Action Programs & Community Development Corporations;

- grocery stores for Food Stamp payees;
- public transit system vehicles;
- homeless shelters;
- utilities to target Low Income Home Energy Assistance Program recipients;
- community health centers; and
- hospitals.

Responsibilities have been assigned as follows:

- DFC offices will be responsible for certifying that individuals on welfare, or just leaving welfare, meet the target group criteria of being on welfare for thirty (30) months or more, of being within twelve (12) months of losing cash assistance, and having two of the three specified labor market deficiencies (lack of high school diploma or GED and have low reading and math skills; require substance abuse treatment for employment; have a poor work history) **OR** are noncustodial parents of minors whose custodial parents receive TANF;
- Local service providers will be responsible for ensuring that at least 70% of the WtW resources are spent on the appropriate targeted populations and that no more than 30% of the funds are spent on individuals who do not meet the above criteria, but who have characteristics associated with long-term welfare dependence; and
- DWD field offices will be active participants in planning and delivering appropriate services. Services may include, but are not limited to, registering for job matching systems, developing appropriate workshops to serve noncustodial parents, and/or forming job clubs. Information Resource Area materials will be reviewed and updated to provide a wide variety of reading levels and resources for the incumbent worker, including job keeping skills. DWD will broker information with partners in Workforce Development Centers to help retain clients in jobs.

Basic Services and Other Activities

A set of basic activities and services consistent with Welfare-to-Work regulations and grounded in a "work first" philosophy have been identified. The basic services will be available in all workforce investment areas and will be provided to the targeted populations as deemed appropriate by the service provider case coordinator responsible for the Family Income Growth plan. WIBs will coordinate with Local Planning Councils to eliminate duplication of effort. These basic services may consist of, but are not limited to:

- Assessment (this is additional assessment, as needed, and not to duplicate any assessment developed previously by DFC);
- Occupational/Career planning (emphasizing employment retention and career advancement);
- Job search workshops and other assistance (life skills education, personal responsibility education);

- Job development and placement;
- Post-employment services emphasizing retention, increased skills, and disposable income;
- Mentoring and job coaching; and
- Basic education and vocational training (in conjunction with post-placement services).

In addition, the following other activities and services will be provided with Welfare-to-Work resources as determined by local service priorities and community needs, if not otherwise available:

- Child care assistance;
- Transportation assistance;
- Substance abuse treatment (non-medical);
- Financial and personal counseling;
- Mental health treatment;
- Emergency housing assistance; and
- Post-employment assistance including clothing allowance and work tools.

2. State and Local Strategies Regarding Employment Activities

Since TANF already provides many employment readiness activities that have proven to be highly successful for those welfare clients who have left welfare or become employed thus far, Indiana believes that WtW funds should be used to enhance, supplement, and expand TANF services and IMPACT, an Indiana employment and training program for Food Stamp and TANF recipients. The following are activities that will be included in either core services or additional activities offered by the service providers:

a. **Employment Activities** - The following employment activities may be available as employment services:

- **Wage Subsidies for Work Experience.** WtW funds may be used to provide short-term on-the-job work experience to participants in WtW.
- **Asset Creation.** DWD will encourage Individual Development Accounts (IDAs) as an activity to help the hardest-to-serve TANF recipients attain self-sufficiency. DWD proposes to use a portion of its 15% Governor's Reserve to promote IDAs for TANF recipients. Additionally, a portion of the 15% will be used as incentives to reward WIB performance, including successful use of IDAs as part of a WIB's WtW strategy.

DWD believes that the creation of assets is one way to foster self-sufficiency. IDAs create assets in the form of restricted savings accounts that can be used by participants only to leverage a secondary asset that will have a positive impact on their ability to stay attached to the labor force.

DWD will encourage WIBs to develop IDAs for participants consistent with the regulations at §645.220. These IDAs may also be developed in conjunction with IDAs currently available through the Indiana Department of Commerce. This program allows up to 800 economically disadvantaged Hoosiers to get IDAs if sponsored by a community development corporation. These IDAs have a 3:1 match and a ceiling of \$1200 and must be administered through Community Development Corporations (CDCs).

- **On-the-Job-Training.** On-the-Job-Training may be provided as a way to help employers with the on-the-job-training costs they incur in hiring hard-to-serve TANF clients.
- **Community Service Programs.** WIBs may support and encourage hard-to-serve TANF clients and noncustodial parents to enter national or state Community Service programs. This is already an allowable component funded by TANF resources.
- b. **Contracts With Public and Private Providers** - WIBs will provide job readiness, placement, and post-employment services through contracts and vouchers. They may provide these services directly if those services are components of a comprehensive program that includes a work experience program, an on-the-job training program, or a program to develop jobs through wage subsidies. The services that may be provided by WIBs through contracts and vouchers with public and private providers are:
 - **Job Readiness and Job Placement.** Creative strategies are needed to prepare individuals for work, to help place them in jobs, and to keep them employed and moving up the career ladder. This may include, but is not limited to, creative job readiness and placement services, specialized counseling to address substance abuse, domestic violence, and mental health issues, and substance intervention services. **NOTE:** Contracts for job placement services supported by WtW funds must require that at least 1/2 of the payment occur after an eligible individual placed into the workforce has been in the workforce for six (6) months.
 - **Post-employment Training and Job Retention Services.** Skills development is essential for the advancement of WtW clients. The post-employment training services and activities offered after an individual is placed in one of the employment activities mentioned above or in a subsidized or unsubsidized job, may also include:
 - basic education skills training
 - occupational skills training
 - English as a second language
 - mentoring



Job Retention and Supportive Services - More long-term transitional strategies and resources are needed to make sure TANF clients stay on the job and fit into the work place. This service may be intensified with noncustodial parents. The following services may be available after the individual has been placed in a job readiness activity or a job:

- substance abuse treatment (non-medical);
Any organization providing specialized counseling for substance abuse must be certified by the State Division of Mental Health. Thus, any WIB who provides this service directly must be certified. Any sub-contractor of a WIB who provides this service must also be certified. Guidelines for the distinction between medical services (which are not allowed under this plan) and non-medical services (which are allowed) are in the Federal Register, November 18, 1998, page 61595.
- domestic violence and mental health interventions;
- parenting skills and case coordination for custodial and noncustodial parents;
- job skill training;
- transitional transportation support assistance;
- housing advocacy support and assistance;
- specialized child care assistance;
- township poor relief; and
- appropriate referral services.

State and Local Policies and Procedures

Services funded through WtW resources will be locally determined and administered by the WIBs. Policies and procedures governing the implementation of the WtW resources are generated at the state level for consistency across the State to facilitate implementation. However, most implementation and service decisions will be made locally.

Those policies and procedures developed at the state level are based primarily on Federal regulation, common definitions, and accepted practices. As the WIBs and service providers request technical assistance, other areas of shared policy and procedure may be developed. The current body of state policy covers:

Eligibility;
Allowable activities;
Assessment;
Family Income Growth Plan; and
Individual Development Accounts.

Performance Goals and Outcomes

According to Section 645.420 of the WtW regulations, state performance will be measured by a formula to be issued by the Secretary of the U.S. Department of Labor (DOL) after consultation with the U.S. Department of Health and Human Services, the National Governor's Association, and the American Public Welfare Association. This formula, which has not been announced yet, will be the basis for measuring the success of Indiana's WtW efforts. According to the regulations, this formula will include (1) the number of eligible participants placed in private sector employment or in any employment, (2) the duration of such employment, and (3) the increase in the earnings of the participant. The State of Indiana will track and measure all three of these factors.

At only eight months into a 36 – 48 month program, Indiana has insufficient data to determine benchmarks. Once DOL reporting requirements are finalized, benchmarks will be determined and goals will be set.

Geographic Divisions

Workforce Investment Boards (WIBs) created under the Workforce Investment Act (WIA) will assume the functions of Private Industry Councils (PICs) in Indiana on July 2, 1999. Therefore, Indiana will make 85% of the WtW funds available to the sixteen WIBs in Indiana or to the designated fiscal agent of Title I adult, youth, and dislocated worker funds in their sub-state area. DWD will retain sufficient funds to cover the administrative cost of the program. WIBs will administer WtW funds at the local level, providing and contracting services through their local service delivery systems. DWD will enter into grant agreements with each WIB to ensure program accountability.

Each Workforce Investment Area in Indiana will have a certified WIB in place by July 2, 1999. The following is a list of the Workforce Investment Areas in Indiana by county. Indiana will submit an addendum to this plan once local elected officials designate their WIBs and fiscal agents.

Northwest Indiana

Counties: Lake

Kankakee Valley

Counties: Jasper, LaPorte, Newton, Porter, Pulaski, Starke

Northern Indiana Partnership

Counties: St. Joseph, Elkhart, Kosciusko, Marshall

Northeast Indiana

Counties: Adams, Allen, DeKalb, Huntington, Noble, Steuben, Wells, Whitley, LaGrange

Tecumseh Area Partnership

Counties: Benton, Carroll, Clinton, Fountain, Montgomery, Tippecanoe, Warren, White

North Central

Counties: Cass, Fulton, Howard, Miami, Tipton, Wabash

Madison-Grant

Counties: Grant, Madison

East Central

Counties: Blackford, Delaware, Henry, Jay, Randolph

Western Indiana

Counties: Clay, Parke, Putnam, Vermillion, Vigo

Circle Seven Training Council

Counties: Boone, Hamilton, Hancock, Hendricks, Johnson, Morgan, Shelby

Marion County

Counties: Marion

Southeastern

Counties: Dearborn, Decatur, Fayette, Franklin, Jefferson, Ohio, Ripley, Rush, Switzerland, Union, Wayne

Shawnee Trace

Counties: Daviess, Dubois, Gibson, Greene, Knox, Lawrence, Martin, Pike, Sullivan

South Central

Counties: Bartholomew, Brown, Jackson, Jennings, Monroe, Owen

Southwest

Counties: Perry, Posey, Spencer, Vanderburgh, Warrick

Hoosier Falls

Counties: Clark, Crawford, Floyd, Harrison, Orange, Scott, Washington

6. Identification and Referral

DWD will continue to supply WtW service providers with a monthly listing of TANF clients in the SDA's counties to enable the service providers to take the lead to meet with TANF case coordinators for identification of WtW eligibles among TANF recipients. To

ease the identification process, the listing includes such personal characteristics as years of schooling and months of available assistance remaining before the client's deadline.

Based on this listing and the TANF files, service providers will undertake a case-by-case review of active TANF cases with county TANF case coordinators, in particular seeking (1) persons on cash assistance for thirty (30) months or more, (2) those who face federal/state imposed time limits, and (3) noncustodial parents.

After consultation with WtW service providers, Indiana has determined the characteristics listed below are predictive of long-term TANF receipt. Individuals who receive TANF and have one of these characteristics are eligible for WtW under the 30% provision.

- Poor work history (as defined under the 70% provision);
- Teenage pregnancy;
- Disability;
- High school drop-out;
- Not married at birth of first child;
- Food Stamp or WIC client;
- Child of welfare recipient;
- Subsidized housing resident;
- Recipient of trustee assistance;
- Limited English proficiency;
- Felony arrest;
- More than one substance abuse arrest;
- Victim of domestic violence;
- On welfare within 2 years of birth of first child; or
- Other documented characteristics locally suggestive of welfare dependency.

The local DFC office will provide information to service provider offices or staff regarding individuals who are potential customers of WtW and/or determined to be eligible for joint enrollment into TANF and WtW. The service provider may choose to place staff at the DFC office to recruit directly. The service providers may also use other recruitment methods to get individuals to cooperate and participate.

WIBs will also work with other community based entities such as township trustees, housing authorities, prosecutors, and court systems for identification of eligible clients.

Assessment and Case Coordination

PICs already use a variety of assessment tools acceptable to the employment and training community. However, training may be provided to WIBs relative to working with this new population.

Case coordination under Welfare-to-Work may be more intensive and individualized since the customer base will be a more hard-to-serve population with multiple barriers that has proven difficult to reach and serve under the regular TANF program. Specialized

counselors will screen and assess individuals with serious substance abuse, domestic violence, or mental health problems. These counselors would be trained and certified in using screening and assessment instruments to determine the extent of treatment needed. Individuals in need of substance abuse or mental health treatment would then be referred to a substance abuse provider or community mental health center for intervention and/or treatment. Long-term team case coordination is envisioned for many individuals who may not be able to retain a job without frequent and intense contacts, even extending to job coaches if necessary. Case coordination will not be limited only to the parent, but will extend to the family if the family is proving to be a barrier to success of the parent.

WtW assessments and case coordination will not duplicate the work of FSSA. FSSA staff will provide case coordination information for WtW customers in a team approach with the service provider case coordinators and other entities who provide case coordination to this population.

7. State Procedures for Monitoring and Oversight

The Department of Workforce Development (DWD) provides oversight and monitoring functions for the administration of the Welfare-to-Work program, JTPA, and other assigned funds through its Oversight Division. Oversight and monitoring responsibilities include:

- Compliance with applicable federal and state laws, regulations, and DOL monitoring priority areas;
- Assurance of proper disbursement of and accounting for all programmatic granted/contracted funds; and
- Assurance of proper documentation of outcomes.

To fulfill its oversight responsibilities, DWD has determined that oversight may consist of a singular process or a combination of actions which are appropriate to the circumstances. DWD's oversight system encompasses:

- Desk top reviews as needed by Oversight Division staff to assure proper program activities and performance. These reviews also identify areas of concern which may need further review, corrective action, or technical/administrative assistance. Areas of review may include, but are not limited to: cash needs, performance, policy and planning activities of the grant recipient/administrative entity, other grantees, and sub-recipients.
- On-site monitoring reviews of Welfare-to-Work resources at state and local offices as needed to achieve sufficient program oversight. After an on-site review is conducted, a report will be issued. This report will serve to call attention to flaws in the Welfare-to-Work systems that might impair the desired program results and will provide an opportunity for collaborative efforts to resolve any problems.
- Resolution of monitoring report findings. The resolution process will assist the grantee in correcting any non-compliance issues discovered by monitoring. This process includes an opportunity for a hearing, requests for corrective action (including time frames), provision of technical assistance, and follow-up support

as necessary. Implementation of a collaborative corrective action plan will help avoid possible sanctions and/or audit findings.

- Performance of special reviews, either on-site or desk top, necessary to assure compliance. Such reviews may be prompted by events such as media coverage, complaints/grievances, or special concerns as identified by monitoring, auditing, or other reviews.
- Provisions of state level policies, operational directives, and information notices. These notices define and clarify program parameters and uniform requirements for DWD, its grant recipients and their administrative entities, and service providers.

Monitoring, Reporting, and Record-keeping

DWD will monitor and oversee the WtW resources in a manner consistent with its monitoring and oversight of other activities in Indiana. Monitoring of substate grantees is done by:

- Conducting, at a minimum, yearly on-site compliance reviews of each grantee by monitors of the Oversight Division; and
- Periodic desk-top reviews of policy and procedure, planned versus actual performance data, and progress in achieving program goals.

On-site monitoring visits will be conducted with a monitoring guide for WtW resources created by DOL and adapted for usage by the Oversight Division of the Indiana Department of Workforce Development.

Welfare to Work Coordination

Welfare clients will enter the WtW program via the current TANF system. All TANF clients will be referred to the WtW service providers as they become eligible for WtW services. Noncustodial parents will be referred from local child support offices, court systems, Step Ahead, and similar programs.

WtW service providers will take the lead to coordinate with county TANF case coordinators in the identification of WtW eligibles among TANF recipients and in the use of TANF funds first for any TANF eligible activity. Additionally WtW service providers will assure that provided WtW activities supplement and enhance the efforts of TANF and IMPACT.

Most TANF clients will have had an assessment that includes Adult Basic Education testing, aptitude, interest, and skill testing. This assessment as well as the self-sufficiency plan will be made available to the service providers. WtW funds may be used to supplement, but not duplicate, this assessment with an individualized service strategy, called a Family Income Growth (FIG) Plan, to be developed in conjunction with the client. The FIG plan will provide the blueprint for the client's WtW services potentially including but not limited to

- Adult Basic Education,
- Job readiness,
- Job search,

Job development,
Job placement,
Job retention,
Coping skills training,
Financial and personal counseling,
Work experience,
Treatment needs, and
Service coordination.

WtW funds will be used to enhance the overall capacity of service providers to assist welfare recipients to find work and progress toward self-sufficiency. To that end, WtW funds will be used to supplement and fill gaps in TANF services. When supplying job retention or support services in particular, TANF resources will be used first.

Consultation and communication are also occurring with other partners, including township trustees, education agencies, colleges and universities, housing agencies, community and faith organizations, transportation providers, and others that may already provide TANF services and who will contribute to WtW program efforts.

9. Coordination with Transportation

The State of Indiana recently received an Access to Jobs Transportation planning grant. Indiana has formed a Welfare-to-Work Transportation planning team consisting of executive level staff of the Governor's office, the Department of Commerce, the Department of Workforce Development, the Department of Transportation, and the Family and Social Services Administration. This team will use the resources from this planning grant to plan for the use of state resources in order to help economically disadvantaged citizens get to and from work.

Local areas have spent WtW funds for transportation for the benefit of specific enrolled individuals. The extreme limitations upon eligibility have prohibited PICs from addressing the needs of communities or even employers. There are simply too few eligible participants to require systemic solutions. The solution for the number of people eligible for WtW is simply to give them rides to work or to repair their cars.

10. State and WIB Strategies to Coordinate with Township Trustees, Housing Agencies, Community Based Organizations, Public and Private Health/Mental Health and Substance Abuse Agencies, Vocational Rehabilitation and Others

Housing Agencies

A referral process that alerts housing agencies when a TANF client has gone to work will be in place, so that his/her income may be excluded for a period of time specified by HUD

regulations. This period of time may extend up to eighteen (18) months in public housing and for as long as the family remains eligible for cash assistance in Section 8 housing. This process may also be adapted and used by the WIBs in WtW.

Community-Based Organizations

FSSA contracts TANF resources to numerous community-based organizations to provide a wide variety of services to welfare clients. Many PICs also contract with many of these same providers to provide JTPA services. DWD anticipates similar arrangements for intensive services under WIA. Strong linkages exist between these agencies, FSSA, and the PICs. WtW will provide additional resources for these agencies and others to provide services to welfare clients.

Public and Private Health/Mental Health Agencies

DWD will coordinate with the Single State Agency on Addictions and the State Mental Health Authority and their providers to assess and access mental health and substance abuse services to provide referral, intervention, and treatment services. This will make available appropriate treatment services to DWD and WIBs to address mental health and substance abuse problems. Where assessments indicate a need for physical health treatment, the mental health or substance abuse treatment provider will refer the individual to the appropriate health care provider.

Substance abuse treatment is specifically provided as an example of a job retention service because one of the eligibility factors under the hard-to-employ criteria is the need for substance abuse treatment. In arranging for substance abuse treatment, Indiana and localities will coordinate with Single State Authority designated by the Governor to receive and administer the Substance Abuse Block Grant.

Vocational Rehabilitation Services

WIB membership includes a representative from Vocational Rehabilitation. Since it is a required partner under WIA, they work closely with this system to ensure appropriate services are provided to individuals with disabilities in this State. In addition, the Vocational Rehabilitation community has many years of experience in working with the hardest-to-serve of our State. Their expertise and experience will be useful in coordinating appropriate services to TANF recipients and noncustodial parents.

The Indiana Association of Rehabilitation Facilities is also actively participating in planning for WtW Resources.

Other Agencies

There are numerous other agencies, including faith-based organizations and township trustees, that will be involved in WtW in one way or another and with which coordination and collaboration efforts will expand. It is the intention of the State and the WIBs to be

inclusive rather than exclusive in the provision of services for TANF recipients.

B. Within State Distribution of Funds

The State of Indiana will distribute not less than 85% of the 1999 WtW grant funds to the sixteen (16) WIBs using the following formula:

- 50% based on the number by which the population of the Workforce Investment Area (WIA), with an income below the poverty line exceeds 7.5% of the total population of the area, compared to all such numbers in all WIAs in the State;
- 50% based on the number of adults in the region who are unemployed, relative to the number of such adults residing in the State.

Sub-state allocations are pending.

C. Coordination and Consultation

Since WtW was enacted in 1997, partnerships have been developed with the TANF program, the State's Workforce Development efforts, township trustees, School-to-Work, and One-Stop Career Center initiatives. These partnerships will continue to serve TANF recipients. All partners were contacted to participate in the planning process for the implementation of WtW. Most attended the planning meetings and participated in a comment process. Coordination and collaboration efforts are in place for the following resources:

- **Private Sector Employers.** PICs have a long history of partnerships with private sector employers, many of which participate on PICs. PICs are 51% private sector members by statute. This history and the statutory involvement of the private sector will continue with the WIBs.
- **Business and Trade Organizations.** Members of trade organizations are involved in councils and advisory boards in both welfare and workforce development planning efforts. Comments and suggestions have been offered by these organizations for the use of WtW resources.
- **Community Development Corporations.** WtW is another funding source to promote IDAs and micro-enterprise business ventures for TANF recipients. Through the Indiana Department of Commerce, the State has initiated IDAs for low income individuals administered by CDCs.
- **Disability Organizations.** Rehabilitation Services is a division of FSSA which has provided services to TANF participants who are unable to function within the regular classroom or work situation due to a disability. These services will continue to be available to TANF recipients. The Indiana Association of Rehabilitation Facilities has also participated in planning for WtW resources.
- **The Indiana Department of Education (IDOE).** IDOE is fully involved and a partner in the TANF and workforce development efforts in this State. FSSA contracts with IDOE for IMPACT services; and PICs have referral and contracting relationships with schools and ABE/GED providers. DWD anticipates increased involvement and coordination with IDOE in the future because of current

- initiatives, which include contracting with IDOE for Adult Basic Education for WtW clients in order to improve their employability. Additionally, ABE, a required partner under WIA, will be represented on every WIB.
- **Educational Institutions.** Two of the PICs have colleges as their administrative entity/grant recipient. This relationship will continue with the two WIBs. All WIBs will be closely aligned to local post-secondary institutions and make good use of their services. They may also be involved in delivering services to WtW eligible individuals. Postsecondary Perkins is a required partner under WIA and will be represented on every WIB.
 - **Faith-Based Organizations.** Many community-based and faith-based organizations are either contractors of TANF services, volunteer mentor providers, or providers of other services, at no cost, to welfare families. Such services typically include food banks, clothes closets, and automobile revolving loan funds among others. This existing service system may enhance services to hard-to-employ TANF recipients and provide a source of mentors.
 - **Public Housing, Section 8 Housing.** Housing agencies work with recipients to provide income disregards under HUD law and regulations when a welfare recipient goes to work after entering an employment training program. This relationship continues under WtW. Housing agencies have also proven quite helpful in recruitment of TANF recipients into WtW services. HUD is a required partner under WIA and will be represented on appropriate WIBs.
 - **Labor Organizations.** Labor organizations have been consulted and included in the solicitation of advice in the development of the plan for WtW resources. Labor is also represented on all WIBs.
 - **Township Trustees.** Township trustees work with eligible clients to provide the following basic needs: clothing, food, household supplies, medical assistance, shelter, utility assistance, and transportation. These services help the client seek and accept employment. Additionally, the trustees have been especially helpful in the eligibility identification process and in the generation of match.
 - **Transportation Agencies.** WIBs serve as the transportation "brokers" for many transportation services. They have working and contractual relationships with transportation providers in the State.

Connection to Temporary Assistance for Needy Families (TANF)

There already exists a close working relationship between FSSA and DWD staff throughout the administrative structure. These relationships have been in existence for many years and have been enhanced with planning for WtW resources. A DWD staff member works in the IMPACT unit at FSSA and participates in policy development, technical assistance, and oversight for TANF.

Public Hearing Process

Each Workforce Investment Board is encouraged to hold information sessions with WIB members, Local Planning Councils, and numerous other community groups and organizations. DWD hosted a policy roundtable on February 22, 1999, for PIC staff and staff from IMPACT, local DFC, and Township Trustees. The roundtable generated the outline for the first draft of this plan. In addition, the draft WtW Plan has been forwarded

to a long list of both public and private nonprofit and not-for-profit agencies and organizations soliciting comments. Interested parties and the general public were invited to a public meeting March 15, 1999, to discuss the revised Indiana Welfare-to-Work State Plan. The Plan will be modified as comments and recommendations are reviewed and accepted. All written comments will be retained for review.

Expenditure of Funds

How the SYSTEM Will Maintain Administrative Costs at Fifteen Percent

DWD will provide each WtW Grant Recipient a grant which has a budget limiting the total allowed for administrative costs to assure a statewide compliance with the 15% cost limitation. All grants issued by the State will be Program Year specific. Contractually, the grantee will be instructed to follow the rules of an expenditure-based program. Failure to comply will result in the Department disallowing any “excessive” administrative costs.

Each WtW grantee will report monthly Accrued Expenditure Reports (AER) not later than the 10th work day using their on-line connection to the State's Financial Accounting Reporting System (FARS). The WtW grantees have access to their own FARS subsystem, Training Funds Financial Information System (TFFIS). Since 1992, TFFIS has been in use by both the State and PIC grant recipients. TFFIS will contain the WtW grantee's allocation against which each can request cash draws and their WtW budget against which the AER input can be compared. Cash drawn compared to AER will also occur.

TFFIS produces monthly Management Reports for both the State and the WtW Grant Recipient and is programmed to identify state-directed cost category limitation compliances. The AER contains the grant's budget, the current month's accrued expenditures, Year-to-Date accrued expenditures (July-June), and Grant-to-Date accrued expenditures (from the start date of the grant to current month). Actual percent of each cost category expenditures to the total is provided. In addition, TFFIS has been programmed to provide a trend analysis of projected total grant/cost category costs should the current AER trends continue to the end of the grant. Any exceptions of either actual or trend are highlighted for management's attention immediately below the AER on the Management Report.

TFFIS produces an Exception Management Report which allows management to focus on only those grants having exceptions.

TFFIS will provide the State comprehensive WtW expenditure management data by producing a WtW AER Roll-Up. WtW AER Roll-up will capture all grantee AER and produce statewide total AER results. All the programming cost category limitation compliance features offered by the above AER Management Report appear in this Roll-Up report.

How WIBs Will Coordinate The Expenditures Between TANF and WtW.

Welfare-to-Work funds are used to wrap additional services around those TANF through IMPACT provides in Indiana to supplement, extend, and enhance the assistance available to TANF clients. For job retention and/or support services, TANF funds are to be spent first.

E. Application for Waiver

Indiana is not requesting any waivers to have an agency other than a WIB administer WtW funds at the local level. Other waivers may be requested later.

II. Description of 15% Projects to Help Long-Term Recipients of Assistance Enter Unsubsidized Jobs

The Indiana Department of Workforce Development will use Governor's 15% funds for competitive grants that promote WtW services for individuals with disabilities, individuals requiring substance abuse treatment for employment, noncustodial parents, victims of domestic violence, and individuals with limited English proficiency.

The State will also use 15% funds as incentives to the WIBs for outstanding performance in administering the WtW resources. Those with the highest performance outcomes that match the federally established measures and state goals will be awarded incentives. These funds may be used by the WIBs to further invest in services and strategies to meet the goals of WtW.

III. Estimate of Matching Funds

1. The following is an estimate of the amount of matching expenditures Indiana expects to make during the fiscal years 1999 and 2000 (assuming equal funding each year).

	1999	2000
Cash (Not less than)	\$3,394,608	\$3,394,608
In-kind (Not more than)	\$3,394,608	\$3,394,608

Cash match funds are non-federal funds not used to match any other federal funds. They must be spent on eligible participants to pay for activities allowed under this plan. In-kind match is goods and services provided in lieu of cash.

The State of Indiana will meet the match requirement with a variety of resources.

Examples of these matching funds include, but are not limited to, township trustee funds, adult basic education funds, private foundation funds, nonprofit poverty relief activities, and private resources available to WIB subcontractors.

Subgrantees will provide monthly match reports to the State concurrent with their transmission of the Accrued Expenditure Reports (AER). Compliance with the cash/in-kind match requirements will be included in the TFFIS Management

Reports and related Exception Reports to alert state staff of the monthly status of each subgrantee.

Funding

The following is an estimate of the expenditures of WtW formula grant funds by percentage of dollars expended:

1998	Cumulative GTD
1st Qtr	10%
2nd Qtr	30%
3rd Qtr	55%
4th Qtr	80%
5th Qtr	95%
6th Qtr	100%

V. Assurances

The State of INDIANA, assures to the following requirements under Title IV-A of the Social Security Act.

PROGRAM ADMINISTRATION/ACTIVITIES

1. The State is an eligible State, pursuant to Section 402(a) for the fiscal year.
2. The State assures that qualified state expenditures { within the meaning of Section 409(a)(7) } for the fiscal year will not be less than the applicable percentage of historic expenditures { within the meaning of Section 409(a)(7) } with respect to the fiscal year.
3. The State has consulted and coordinated with the appropriate entities in the substate areas regarding the plan and the design of WtW services in the State.
4. The State will make available to the public a summary of the WtW plan.
5. The State has agreed to negotiate in good faith with the Secretary of Health and Human Services with respect to the substance and funding of any evaluation under Section 413(j) and to cooperate with the conduct of such an evaluation.
6. The State shall not use any part of these grant funds, nor any part of state expenditures made to match the funds, to fulfill any obligation of any state, political subdivision, or WIB to contribute funds under sections 403(b) or 418 or any other provisions of the Social Security Act or other Federal law.
7. The State will return to The Secretary of Labor any part of the WtW funds that are not expended within 3 years after the date the funds are so provided.

8. The State WtW program will be conducted in accordance with the WtW legislation, regulatory provisions, future written guidance provided by the Department, and all other applicable Federal and state laws.
9. The State will apply the TANF law and regulations to the operation of the WtW program, unless otherwise specified by the Department of defined in Section 403(a)(5) or the applicable WtW regulations.
10. The State assures that services under the WtW grant are provided to eligible participants only.
11. The State will maintain and submit accurate, complete and timely participant and financial records reports, as specified by the Secretary of Labor and the Secretary of Health and Human Services.
12. The State will establish a mechanism to exchange information and coordinate the WtW program operated by the State and WIBs with other programs available that will assist in providing welfare recipients employment.
13. The State shall adhere to the certifications required under TANF and will meet the TANF maintenance of effort requirements.
14. The State will comply with the uniform fiscal and administrative requirements of OMB Circular A-102 as codified for DOL at 29 CFR Part 97.
15. The State will follow the audit requirements of The Single Audit Act of 1984 and OMB Circular A-133.
16. The State will follow the allowable cost/cost principles of OMB Circular A-87.

WORKER PROTECTIONS

1. The State will establish policies to enforce the provisions regarding nondisplacement in work activities under a program operated with funds provided under WtW pursuant to 20 CFR Part 645.265 (Interim Welfare to Work regulations.)
2. The State assures that the Health and Safety standards established under Federal and state law otherwise applicable to working conditions of employees shall be equally applicable to working conditions of other participants engaged in a work activity under a program operated with funds provided under WtW pursuant to 20 CFR Part 645.260 and other applicable federal and state guidance.
3. The State will enforce the provision that an individual may not be discriminated against by reason of gender with respect to participation in work activities under a program operated with funds provided under WtW pursuant to 20 CFR 645.255

(Interim Welfare to Work regulations.)

4. The State shall establish and maintain procedures for grievances or complaints from participants and employees under the WtW program. The procedures established will be consistent with the requirements of Section 403(a)(5)(J)(iv) and 20 CFR Part 645.270 (Interim Welfare to Work regulations.)
5. The State shall establish and enforce standards and procedures to ensure against fraud and abuse, including standards and procedures against nepotism, conflicts of interest among individuals responsible for the administration and supervision of the state WtW program, kickbacks, and the use of political patronage.
6. The State will comply with the nondiscrimination provisions of the laws enumerated at Section 408(d), with respect to participation in work activities engaged in under the WtW program pursuant to 20 CFR Part 645.255 (Interim Welfare to Work regulations.)

Signature for Assurances

Frank O'Bannon
Governor
State of Indiana

Date

VI. Signature for State WtW Plan

Frank O'Bannon
Governor
State of Indiana

Date